

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
CAROL ANNE BOND	:	VIOLATIONS:
	:	18 U.S.C. § 229(a) (using a chemical weapon - 2 counts)
		18 U.S.C. § 1708 (theft of mail - 2 counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Potassium dichromate was a toxic chemical as defined under 18 U.S.C. § 229F(1)(A) and (8)(A) and had the potential to cause death or permanent harm to humans or animals.

2. 10-cholo-10H-phenoxarsine was a toxic chemical as defined under 18 U.S.C. § 229F(1)(A) and (8)(A) and had the potential to cause death or permanent harm to humans or animals.

3. From in or about December 2000 through on or about November 2, 2006, defendant CAROL ANNE BOND was employed by Rohm and Haas at the Spring House Technical Center as a level 5 technical assistant in the CIS / Biocides organization. At the time of her resignation, her responsibilities included microbiological challenge testing on plastics

samples and some routine analytical work, including high pressure liquid chromatography (HPLC). In this position, she had access to potassium dichromate and 10-cholo-10H-phenoxarsine.

4. From in or about November 2006, through on or about June 7, 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

CAROL ANNE BOND

knowingly acquired, transferred, received, retained, possessed and used a chemical weapon, that is, potassium dichromate, which is a toxic chemical not intended by defendant Bond to be used for a peaceful purpose as that term is defined in Title 18, United States Code, Section 229F(7)(A).

In violation of Title 18, United States Code, Section 229(a)(1).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are incorporated here.
2. From in or about November 2006, through on or about June 7, 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

CAROL ANNE BOND

knowingly acquired, transferred, received, retained, possessed and used a chemical weapon, that is, 10-cholo-10H-phenoxarsine, which is a toxic chemical not intended by defendant Bond to be used for a peaceful purpose as that term is defined in Title 18, United States Code, Section 229F(7)(A).

In violation of Title 18, United States Code, Section 229(a)(1)

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 26, 2007, in Norristown, in the Eastern District of Pennsylvania, defendant

CAROL ANN BOND

knowingly stole, took, and abstracted United States mail from a letter box, an authorized depository for mail matter, that is, defendant stole mail from the mailbox of 24 Zummo Way, Norristown, PA.

In violation of Title 18, United States Code, Section 1708.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 12, 2007, in Norristown, in the Eastern District of
Pennsylvania, defendant

CAROL ANN BOND

knowingly stole, took, and abstracted United States mail from a letter box, an authorized
depository for mail matter, that is, defendant stole mail from the mailbox of 24 Zummo Way,
Norristown, PA.

In violation of Title 18, United States Code, Section 1708.

_____ **A TRUE BILL:**

FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY